

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA
WPC LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; CARLETON
NELSON; CASEY KIRSCHNER;
ALLCORE DEVELOPMENT LLC;
FINBRIT HOLDINGS LLC; CHESHIRE
VENTURES LLC; 2010 IRREVOCABLE
TRUST; SIGMA REGENERATIVE
SOLUTIONS LLC; CTBSRM, INC.;
RODNEY ATHERTON; DEMETRIUS VON
LACEY; RENRETS LLC,

Defendants.

CASE NO. 1:20-CV-484-RDA-IDD

800 HOYT LLC,

Intervening Interpleader
Plaintiff, Intervening
Interpleader Counter-
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;
BW HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON
DATA SERVICES, INC.,

Interpleader Defendants,
Interpleader Counter-Plaintiffs.

**DECLARATION OF CLAUDIA M. BARRETT IN SUPPORT OF PLAINTIFFS'
RESPONSE TO DEFENDANTS' MOTION TO VACATE PRELIMINARY
INJUNCTION AND APPOINTMENT OF MARK A. ROBERTS AS RECEIVER**

I, Claudia M. Barrett, declare under penalty of perjury as follows:

1. I am over the age of 18 years. I am an attorney licensed to practice law in the state of California and the District of Columbia. I am an attorney at the law firm of Gibson, Dunn & Crutcher LLP (“Gibson Dunn”), and counsel for Amazon.com, Inc. and Amazon Data Services, Inc. (collectively, “Amazon” or “Plaintiffs”) in the above-captioned action. I make this declaration in support of Plaintiffs’ Response to Defendants’ Motion to Vacate Preliminary Injunction and Appointment of Mark A. Roberts as Receiver.

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the transcript of the April 8, 2023 deposition of Kyle Ramstetter in the above-captioned action.

3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the transcript of the April 6, 2023 deposition of Christian Kirschner in the above-captioned action.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

Executed on April 21, 2023.



Claudia M. Barrett